

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA,

Plaintiff,

v.

Case No. 15-CR-13

JOSEPH J. VALDEZ,

Defendant.

**DEFENDANT'S MOTION FOR EXTENSION OF TIME
IN WHICH TO FILE PRETRIAL MOTIONS**

Joseph Valdez, by counsel, requests additional time in which to file pretrial motions related to this case. The bases for this request are as follows:

1. On January 22, 2015, Mr. Valdez was arraigned on a four-count indictment charging him with three counts of sexual exploitation of a minor and one count of possession of child pornography. The final pretrial date is set for March 18, 2015, at 1:30 p.m, with trial currently scheduled for March 30, 2015. The motions schedule was set as follows:

Motions due February 6, 2015;

Response due February 17, 2015; and,

Reply due February 23, 2015.

2. Defense counsel spoke to Assistant United States Attorney Daniel Humble today regarding discovery. AUSA Humble assured counsel discovery would go out by January 27, 2015. However, defense counsel will be on vacation from January 28 through February 6, 2015. At the current schedule, defense counsel will not have time to review the discovery before the motions deadline.

3. Defense counsel spoke with Assistant United States Attorney Daniel Humble and is authorized to state that the government does not object to defendant's request for an extension of time to file motions.

4. Defense counsel requests, and the government agrees, that the motion schedule in this case be amended as follows:

Motions due February 20, 2015;

Response by March 2, 2015; and

Reply by March 6, 2015.

Dated at Green Bay, Wisconsin, this 26th day of January, 2015.

Respectfully submitted,

s/ Krista Halla-Valdes

Krista Halla-Valdes, Florida Bar #0073369

Attorney for Joseph Valdez

Federal Defender Services of Wisconsin, Inc.

801 E. Walnut Street, Second Floor

Green Bay, Wisconsin 54301

Tel: 920-430-9900

Fax: 920-430-9901

krista_halla-valdes@fd.org

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